



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

**75 Hawthorne Street**

**San Francisco, CA 94105-3901**

July 16, 2007

Gary Houston  
Environmental Division Chief  
U.S. Army Combat Support Training Center  
791 U.S. Army  
Attn: IMWE-CST-P  
Dublin, CA 94568-5201

Subject: Draft Environmental Impact Statement (DEIS), Camp Parks Real Property Master Plan, Dublin, California (CEQ # 20070210)

Dear Mr. Houston:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.


The proposed action is redevelopment of a 487-acre section of the Camp Parks military training area under a Master Plan, and transfer of 180 acres to private ownership for development. The project also includes increases in military training on existing training land.

Based on our review, we have rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions"). We have concerns regarding impacts to air quality, especially since the area does not currently meet air quality standards that are necessary for protection of human health. Additional mitigation measures should be incorporated into the project to reduce air pollutant emissions. In addition, the DEIS focuses largely on the development component of the project and does not include an adequate impact analysis for the increases in training activities that will occur. More information on training impacts should be included in the Final EIS, including specific mitigation measures that will reduce impacts to resources from training exercises.

EPA appreciates the opportunity to review this DEIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: CED-2). If you have any

questions, please contact me at (415) 972-3846 or Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or [vitulano.karen@epa.gov](mailto:vitulano.karen@epa.gov).

Sincerely,

*For*   
Nova Blazej, Manager  
Environmental Review Office

Enclosure: Summary of EPA Rating Definitions  
EPA's Detailed Comments

## **SUMMARY OF EPA RATING DEFINITIONS**

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

### **ENVIRONMENTAL IMPACT OF THE ACTION**

#### ***"LO" (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### ***"EC" (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### ***"EO" (Environmental Objections)***

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### ***"EU" (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

### **ADEQUACY OF THE IMPACT STATEMENT**

#### ***Category 1" (Adequate)***

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### ***"Category 2" (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### ***"Category 3" (Inadequate)***

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

### **Air Quality Impacts**

The DEIS indicates that the air quality in the region of Camp Parks is not in attainment for the health-based National Ambient Air Quality Standards (NAAQS) for ozone (p. 3-4). The cumulative impact analysis notes the large increases in development surrounding Camp Parks, and acknowledges that the cumulative effects on air quality are significant (p. 5-3), resulting in decreased air quality in the vicinity of Dublin and San Ramon.

The DEIS states that since Best Management Practices were assumed during emission calculations, little additional mitigation is likely (p. 5-3). Appendix D-4 and p. 4-4 of the DEIS identify construction mitigation only as consisting of watering exposed surfaces and unpaved haul roads to control dust and to replace ground cover in disturbed areas quickly. The only operational measure identified is that no wood stoves would be constructed in any of the Camp Parks buildings, but there is no further information regarding how this assumption will be ensured, especially since the Dublin Crossing development will be the purview of the City of Dublin. In addition, there is no discussion of diesel emissions. EPA is aware of the serious health effects that diesel particulate and other fine particulates can cause and urges the Army to reduce particulate emissions to the greatest extent possible.

*Recommendation:* In the FEIS, provide additional information to ensure that no wood stoves will be installed for the project. If these assurances can not be made, update the modeling assumptions accordingly.

Identify additional operational phase mitigation measures to reduce emissions and incorporate these into the project. Examples are inclusion of bicycle lanes and bicycle parking into project designs, incorporation of BART shuttles and ride-sharing programs, and use of zero-emission vehicles for on-base travel, etc.

Construction phase mitigation measures should also be more robust. EPA recommends including a Construction Emissions Mitigation Plan (CEMP) for fugitive dust and diesel particulate matter (DPM) in the FEIS and adopting this plan in the Record of Decision. The following mitigation measures should be included in the CEMP in order to reduce impacts associated with emissions of ozone precursors, particulate matter and air toxics from construction-related activities:

- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. Control technologies such as particle traps control approximately 80 percent of DPM. Specialized catalytic converters (oxidation catalysts) control approximately 20 percent of DPM, 40 percent of carbon monoxide emissions, and 50 percent of hydrocarbon emissions.

- Ensure that diesel-powered construction equipment is properly tuned and maintained, and shut off when not in direct use. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.
- Prohibit engine tampering to increase horsepower, except when meeting manufacturer's recommendations.
- Locate diesel engines, motors, and equipment staging areas as far as possible from residential areas and sensitive receptors (schools, daycare centers, and hospitals).
- Require the use of low sulfur diesel fuel (<15 parts per million sulfur) for diesel construction equipment, if available.
- Reduce construction-related trips of workers and equipment, including trucks. Develop a construction traffic- and parking-management plan that minimizes traffic interference and maintains traffic flow.
- Lease or buy newer, cleaner equipment (1996 or newer model), using a minimum of 75 percent of the equipment's total horsepower.
- Use lower-emitting engines and fuels, including electric, liquified gas, hydrogen fuel cells, and/or alternative diesel formulations.
- Implement the following Fugitive Dust Source Controls:
  - Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate, to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
  - Install wind fencing and phase grading operations where appropriate, and operate water trucks for surface stabilization under windy conditions.
  - When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

EPA recommends that the DEIS disclose the available information about the health risks associated with vehicle emissions and mobile source air toxics (see <http://www.epa.gov/otaq/toxics.htm>).

We also have the following comments regarding the Air Quality section of Chapter 3:

- The DEIS states that in March 2001, EPA again proposed a finding that the Bay Area had not attained the one-hour ozone NAAQS and that currently the Bay Area is in the process of requesting EPA to redesignate the area "attainment/maintenance" for ozone (p. 3-4). The FEIS should be updated to state that in 2004, EPA made a finding that the Bay Area had attained the 1-hr ozone standard. The effect of that finding is to suspend certain nonattainment area requirements. The 1-hr standard

was subsequently revoked by EPA. The Bay Area is currently designated as a marginal nonattainment area for the federal 8-hr ozone standard. The Bay Area Air Quality Management District is not at present working on a redesignation request/maintenance plan for the 8-hr ozone standard. Please note that EPA has recently proposed to lower the ozone standard, indicating our concern that the current standard is not protective enough of human health. This information should be included in the FEIS.

- EPA has not yet designated areas as non-attainment for the new 24-hour standard for Particulate Matter with a diameter of 2.5 microns or less (PM<sub>2.5</sub>); however, preliminary data indicate that the Bay Area is not meeting the revised PM<sub>2.5</sub> 24-hr NAAQS. Preliminary monitoring data indicate that the San Jose monitor is recording violations of the new standard and monitors in Livermore and Concord are very close to violating the standard. This information should be included in the FEIS.
- The data for all pollutants under “Local Ambient Air Quality” (p. 3-4 through 3-5) should be updated to include data for 2006. We note that for the ozone discussion, the operative standard (federal) at present is the 8-hour ozone standard, not the 1-hr standard. This discussion should be expanded to include more current data and should be framed in the context of the 8-hr standard. For the particulate matter discussion, update data and discuss within the context of the new 24-hr standard of 35 ug/m<sup>3</sup>.
- Under Title V permit status, the information in the DEIS appears to be based on the old standard. This discussion should be updated to be consistent with the 8-hr ozone NAAQS. The Bay Area is classified, as marginal. Also, this section references a 2003 air emissions inventory at Camp Parks. Update this using more recent information.

### **Impacts from Increased Training Activities**

The proposed action anticipates a population increase at Camp Parks of 85% for total assigned personnel, increasing the population by almost 2,000 people by 2012 (p. 2-1). The DEIS states that the frequency and duration of training activities would likely increase in response to installation population increases and military training needs (p. iii), and that the number of soldiers and amount of training is expected to “dramatically” increase during a time of war (p. 3-73). While the DEIS outlines the different kinds of training activities that generally occur, the DEIS does not identify and assess the environmental impacts from increases in these training activities.

*Recommendation:* The FEIS should include an assessment of environmental impacts from expected wartime training activities occurring now and expected in the future. The assessment should include impacts to all environmental resources, including soils, hydrology and groundwater, and habitat. The FEIS should clarify whether the current wars in Iraq and Afghanistan will result in dramatic increases in wartime training

activities at Camp Parks.

### **Hazardous Waste Contamination**

EPA is currently assessing the Parks Reserve Forces Training Area under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund. The preliminary assessment evaluates whether the site is a federal concern and determines whether it is eligible for placement on the National Priorities List. It is anticipated that this assessment will be completed within a year.

The DEIS notes several areas that may be impacted by hazardous substances that have not been fully assessed and/or remediated. The full impact of redevelopment cannot be evaluated without completing all necessary hazardous substance assessments. The potential for vapor intrusion, when chemicals in soil or groundwater move up through the soil and into nearby buildings contaminating indoor air, should be considered in these assessments.

*Recommendation:* In the FEIS, disclose that the project site is being evaluated by EPA under the Superfund program. Any updates to the hazardous substance assessments should be included in the FEIS. EPA recommends the vapor intrusion pathway be evaluated to identify risks to human health at redevelopment sites.

### **Biological Resources**

EPA is concerned that the proposed development in the Cantonment Area will impact a number of Western burrowing owls which, in addition to being U.S. Fish and Wildlife Service (USFWS) species of concern, are designated as a California Species of Special Concern. This designation was not identified in the DEIS. In addition, EPA does not agree with the statement that "loss of occupied nesting habitat in the Cantonment Area on Camp Parks does not directly affect the regional population" of burrowing owls (page 4-31). Any loss of a breeding population for this species is of concern and should be avoided.

*Recommendation:* In the FEIS, substantiate the conclusions regarding impacts to the burrowing owl. Incorporate measures into the project to mitigate these impacts. EPA recommends that in addition to consultation with the USFWS, that the Army also consult with the California Department of Fish and Game for the species impacted by the project that are also protected by the State of California, such as the western burrowing owl, the California red-legged frog and the California tiger salamander.

### **Sustainable Building**

The project involves new construction of facilities. The DEIS does not discuss the Executive Order (E.O.) 13423 – Strengthening Federal Environmental, Energy, and Transportation Management. This E.O. supports energy efficiency, water conservation, and the use of renewable energy products by the federal government, providing specific goals towards these ends. The E.O. also states that agencies shall ensure that new construction and major renovation of agency buildings comply with the Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings set forth in the 2006 Federal Leadership in High

Performance and Sustainable Buildings Memorandum of Understanding (MOU), of which the U.S. Army is a signatory. Through the MOU, the DoD agreed to: reduce the energy cost budget by 30% for new construction and 20% for major renovations; employ strategies to reduce indoor and outdoor water use and reduce stormwater runoff and pollution; use products with recycled content; and use biobased products made from rapidly renewable resources and certified sustainable wood products.

*Recommendation:* The FEIS should identify the sustainable building requirements identified above and indicate how the project will comply with them. Specific commitment towards the goals of the E.O. and MOU should be included. Consistent with Executive Order 13423, Section 2(f) and MOU Section II, the project should be designed to earn the Energy Star® targets for new construction and major renovation where applicable. EPA also recommends the Army commit to facilities that are certified as a green building per the Leadership in Energy and Environmental Design (LEED) green building rating system. LEED emphasizes state of the art strategies for sustainable site development, water savings, energy efficiency, materials selection, and indoor air quality. More information about the LEED green building rating system is available at <http://www.usgbc.org/DisplayPage.aspx?CategoryID=19>.